

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

(1) HARDIK JAYANTILAL PATEL,

Defendant.

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CASE NO. 4:23-CR-218-1

**JOINT MOTION FOR ORDER AUTHORIZING DEPOSIT OF SEIZED FUNDS
INTO COURT REGISTRY IN ANTICIPATION OF RESTITUTION**

The United States of America and Defendant Hardik Jayantilal Patel, through counsel, hereby jointly move the Court to issue an order directing the United States Customs and Border Protection (CBP) to turn over to the U.S. District Court Clerk \$17,005 in funds seized from Mr. Patel at the time of his arrest, and currently being held for forfeiture, so that these funds may be applied to Mr. Patel's anticipated restitution judgment at sentencing. The Government has conferred with CBP regarding this motion and proposed order, and the agency has no opposition.

Background

When Mr. Patel was arrested in this case in August 2023, agents executed a federal search warrant and seized \$17,0005 U.S. currency from his residence. CBP initiated administrative forfeiture for the cash under Case No. 2023410700002201, alleging that the property was subject to forfeiture as property involved in money laundering. Notice of the action was mailed to Mr. Patel and posted on a government website, and Mr. Patel through his attorney has acknowledged awareness of the forfeiture proceeding. To date, CBP has not received a petition or claim to the funds noticed for forfeiture.

Terms of Plea Agreement

On December 1, 2023, Mr. Patel entered a guilty plea to Count One, Conspiracy to Commit Mail Fraud in violation of 18 U.S.C. § 1349. In his plea agreement, Mr. Patel agreed to entry of an order directing that the cash seized from him at the time of his arrest be paid over to the court registry in anticipation of the restitution order in this case. *See* Docket Entry No. 42 at ¶ 21(c).

Proposed Order

The undersigned has conferred with CBP regarding the terms of Mr. Patel's plea agreement and the fact that restitution will be entered in this case. CBP has agreed to forego forfeiture of the \$17,005 cash seized at or around the time of Mr. Patel's arrest and to pay those funds to the Southern District of Texas court registry pursuant to Court order.

A proposed order is provided for the Court's consideration, directing the payment of these funds and authorizing the Clerk's Office to accept the funds in anticipation of restitution in this case.

Respectfully Submitted,

ALAMDAR S. HAMDANI
United States Attorney
Southern District of Texas

By: /s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorney

AGREED:

/s/ Steven Block (electronically signed by permission)
Steven Block
Attorney for Hardik Jayantilal Patel